

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JUDGE STEIN**

The JAY PETER KAUFMAN REVOCABLE  
TRUST, On behalf of Itself and All Others  
Similarly Situated,

Plaintiff,

vs.

NEW CENTURY FINANCIAL CORPORATION,  
BRAD A. MORRICE, ROBERT K. COLE,  
MARILYN A. ALEXANDER, HAROLD A.  
BLACK, FREDRIC J. FORSTER, EDWARD F.  
GOTSCHALL, DONALD E. LANGE, MICHAEL  
M. SACHS, RICHARD A. ZONA, PATTI M.  
DODGE, DAVID EINHORN, BEAR, STEARNS  
& CO., INC., MORGAN STANLEY & CO., INC.,  
STIFEL NICOLAUS & COMPANY,  
INCORPORATED, and JEFFRIES & COMPANY,  
INC.,

Defendants.

**07 CV**  
Civ. No.

**2902**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Class member the Jay Peter Kaufman Revocable Trust ("Movant"), by its counsel, will hereby move this Court on a date and at such time as may be designated by the Court for an Order: (i) appointing Movant as Lead Plaintiff of a Class or Subclass of purchasers of New Century Series B Preferred Stock; (ii) approving Movant's selection of Milberg Weiss & Bershad LLP to serve as Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion,

Movant submits herewith a Memorandum of Law and the Declaration of Peter Safirstein dated April 10, 2007.

DATED: April 10, 2007

Respectfully submitted,

MILBERG WEISS & BERSHAD LLP

  
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